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8 *Litigation Finance Fund International SP*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

INFINITY CAPITAL MANAGEMENT, INC.

Debtor.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Defendant.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Claimant,

v.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Defendant.

Case No. 21-14486-abl
Chapter 7

Adversary Case No. 21-01167-abl

**STIPULATION TO EXTEND
DEADLINE TO OPPOSE
TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT AS TO
DIRECT PURCHASE
RECEIVABLES**

Hearing Date: October 25, 2022

Hearing Time: 1:30 p.m.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Claimant,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Defendant.

HASelect-Medical Receivables Litigation Finance Fund International SP (“HASelect”), by and through its undersigned counsel, and Tecumseh-Infinity Medical Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel (each a “Party” and, collectively, the “Parties”), hereby agree and stipulate as follows:

1. On or about August 26, 2022, Tecumseh filed its *Motion for Partial Summary Judgment as to Direct Purchase Receivables* [ECF No. 90] (the “Motion”);

2. The Motion is set for hearing for October 25, 2022 at 1:30 p.m.;

3. In connection with the Motion, Tecumseh also filed a separate motion [ECF No. 95] seeking to file “Exhibit I” to the Motion under seal. Exhibit I consists of approximately 450 pages of records maintained by Debtor Infinity Capital Management, Inc. relating to the accounts receivable that are the subject to the Motion that were not previously disclosed by the Debtor. Exhibit I was served on counsel for HASelect on September 12, 2022;

4. Pursuant to Local Rule 7056, unless the Court orders otherwise, HASelect is to file its Opposition to the Motion within twenty-one (21) days after service of the Motion, making HASelect’s Opposition to the Motion due on September 16, 2022 (the “Opposition Deadline”);

5. Pursuant to Local Rule 7056, unless the Court orders otherwise, Tecumseh is to file its reply to the Opposition within fourteen (14) days after service of the Opposition (the “Reply Deadline”);

6. Based on the foregoing and the extended amount of time that remains prior to the hearing on the Motion, the Parties have agreed to extend the Opposition Deadline and the Reply Deadline.

1 **ACCORDINGLY, IT IS HEREBY STIPULATED** that the Opposition Deadline shall be
2 extended from September 16, 2022 to September 28, 2022.

3 **IT IS FURTHER STIPULATED** that the Reply Deadline will be due twenty-six (26) days
4 after service of the Opposition.

5 **IT IS SO STIPULATED.**

6
7 **SHEA LARSEN**

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CERTIFICATE OF SERVICE

1. On September 15, 2022, I served the following document(s): **STIPULATION TO EXTEND DEADLINE TO OPPOSE TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP'S MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO DIRECT PURCHASE RECEIVABLES**

2. I served the above document(s) by the following means to the persons as listed below:

☒ a. ECF System:

CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON
clarisse@nv-lawfirm.com, bknotices@nv-lawfirm.com

GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP
ggordon@gtg.legal, bknotices@gtg.legal

MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP
michael.napoli@akerman.com,
cindy.ferguson@akerman.com; catherine.kretzschmar@akerman.com; laura.taveras@akerman.com; masterdocketlit@akerman.com; teresa.barrera@akerman.com

ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP
ariel.stern@akerman.com, akermanlas@akerman.com

☐ b. United States mail, postage fully prepaid:

☐ c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System): Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax

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1 numbers listed below. No error was reported by the fax machine that I used. A copy
2 of the record of the fax transmission is attached.

3 ☐ f. By messenger:

4 I served the document(s) by placing them in an envelope or package addressed to
5 the persons at the addresses listed below and providing them to a messenger for
6 service.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Dated: September 15, 2022.

9 By: /s/ Bart K. Larsen, Esq.